

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

VS.

ROBERT D'ANDREA

FILED
CLERKS OFFICE
NO. 04-10262-DPW
2006 JUL 19 A 11:28

U.S. DISTRICT COURT
DISTRICT OF MASS.

MOTION TO SUSPEND SURRENDER DATE

Now comes the defendant in the above captioned matter and prays this Honorable Court grant him a suspension to his surrender date of July 21, 2006. As reasons for such suspension the defendant states the following.

1. Due to the incarceration of my wife, Debra D'Andrea, and the fact that I was left home to care for our three children, I was unable to work for the past six months, which created a great hardship for my family. Since my wife was released, I have obtained steady employment and am able to bring home a regular pay check.
2. My beloved mother passed away in October of 2005 and my sister & I are in probate court (Pro Se) against our brother Vincent, which hopefully will be resolved in the next few months. Which could greatly enhance my ability to repay my financial obligation.
3. Due to the circumstance of having to report to Raybrooke Correctional Institute in New York, which is approximately a 5½ drive from my home, my three children and wife would have a tremendous hardship with me that far away and would not be able to visit.

4. I have had conversation with Asst. District Attorney, Michael Pineault and have explained these extraordinary circumstances to him in detail on July 18, 2006.
5. I am looking for an extension of 3 months from my surrender date of July 21, 2006, so that these issues at hand may be resolved and I can secure my families financial future while I am incarcerated.

For these reasons, I ask this Honorable Court to suspend the surrender date that was imposed on me.

Robert D'Andrea

A handwritten signature in black ink, appearing to read 'Robert D'Andrea', with a long horizontal flourish extending to the right.